

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	
Steven A. Swan	:	Bankruptcy No. 19-10811
Melissa J. Swan	:	Chapter 13
Debtor	:	
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Steven A. Swan	:	
	:	
Plaintiff	:	
	:	
v.	:	Adv. Proceeding No.
	:	24-00069-pmm
	:	
The United States Department of	:	
Education	:	
	:	
Defendant	:	

ORDER

AND NOW, this ____ day of _____, 2025, upon consideration of Defendant's Fourth Unopposed Motion for an Extension, it is hereby ORDERED that the motion is GRANTED. The defendant shall file a response to the Complaint on or before April 4, 2025.

BY THE COURT:

HONORABLE PATRICIA M. MAYER
Judge, United States Bankruptcy Court

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Steven A. Swan	:	
	:	
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	:	24-00069-pmm
	:	
The United States Department of Education	:	
	:	
Defendant	:	

**FOURTH UNOPPOSED MOTION FOR AN EXTENSION OF TIME
IN WHICH DEFENDANT MAY RESPOND TO THE COMPLAINT**

Defendant respectfully moves this Honorable Court to extend the response date on which the government defendant must respond by sixty (60) days. The bases for this motion are set forth below:

1. Plaintiff/debtor filed an adversary complaint on May 2, 2024, seeking discharge of his federally insured student loans pursuant to 11 U.S.C. § 523(a)(8).
2. In November 2022, the United States announced guidance to Department of Justice attorneys addressing the discharge of federal student loan debt in bankruptcy.
3. The parties are pursuing resolution in accordance with the Department of Justice guidance relating to discharge of student loans in bankruptcy. This process may result in a stipulated agreement on the relevant facts necessary to make a discharge

determination.

4. The process involves exchanging information and the Department of Education considering debtor's submission of an attestation as to his economic circumstances.

5. The parties are currently in the process of exchanging information in furtherance of the possible resolution of this matter.

6. The parties agree that defendant's answer deadline in this matter should be extended to allow time for Plaintiff to provide the information and for ED to review the information.

7. Counsel for the defendant consulted with the plaintiff's attorney, who concurs with this request.

8. Accordingly, the defendant requests to file a response to the Complaint on before **April 4, 2025**.

Respectfully submitted,

JACQUELINE C. ROMERO
United States Attorney

/s/ Isaac J. Jean-Pierre
ISAAC J. JEAN-PIERRE
ANTHONY ST. JOSEPH
Assistant United States Attorney
Eastern District of Pennsylvania
615 Chestnut Street, Suite 1250
Philadelphia PA, 19106

Dated: January 23, 2025

Counsel for Department of Education

CERTIFICATE OF COUNSEL PURSUANT TO LOCAL RULE 7.1(b)

I certify that on January 23, 2025, I communicated by email with counsel of record for Plaintiff/Debtor, who confirmed that Plaintiff/Debtor does not oppose this motion for extension of time for Defendants' response to the Complaint.

Dated: January 23, 2025

/s/ Isaac J. Jean-Pierre
ISAAC J. JEAN-PIERRE
ANTHONY ST. JOSEPH
Assistant United States Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of January 2025, I served a true and correct copy of the foregoing Unopposed Motion for and Extension via ECF on:

Joshua Cohen
Cohen Consumer Law, PLLC
P.O. Box 1040
St. Albans, VT 05478
(Counsel for Debtor)

/s/ Isaac J. Jean-Pierre
ISAAC J. JEAN-PIERRE
ANTHONY ST. JOSEPH
Assistant United States Attorneys